

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
GENERAL ELECTRIC COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 08-591-TSE/JFA
	)	
ADRIANA KOECK,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STATUS REPORT**

Plaintiff General Electric Company and defendant Adriana Koeck make the following joint status report:

1. By order of November 19, 2008, the Court stayed this action in order to allow a settlement agreement to be finalized in a putative class action pending in the United States District Court for the District of Connecticut captioned *Lorena F. Schaefer v. General Electric Company, et al.*, Case No. 3:07-CV-0858 (PCD) ("*Schaefer*"). As the parties herein represented to the Court at a status hearing that same day, the parties in this case have reached an agreement on all outstanding claims in this action. This settlement, however, is part of a settlement in the *Schaefer* case.

2. Lead counsel for defendant in this action are also plaintiffs' counsel in *Schaefer*.

3. Significant progress toward a final version of the settlement papers in *Schaefer* has been made. Because of the complexity of the *Schaefer* case, the parties are still finalizing the settlement agreement documents in that case.

4. The parties estimate that the settlement papers will likely be fully executed by the end of this week. The parties must thereafter await the expiration of the seven-day revocation period specified by the Older Workers Benefit Protection Act, 29 U.S.C. §626(f), before the settlement can become effective.

WHEREFORE, the parties ask that the Court keep the stay in place for an additional 14 days, to and including December 29, 2008.

Respectfully submitted,

/s/  
Robert B. Nealon  
Virginia Bar No. 23096  
Jay I. Igiel  
Virginia Bar No. 65576  
Michael T. Pritchard  
Virginia Bar No. 65846  
*Attorneys for Adriana Koeck*  
NEALON & ASSOCIATES, P.C.  
119 N. Henry Street  
Alexandria, VA 22314  
(703) 684-5755  
(703) 684-0153 (fax)  
[rbnealon@nealon.com](mailto:rbnealon@nealon.com)  
[jigiell@nealon.com](mailto:jigiell@nealon.com)  
[mpritchard@nealon.com](mailto:mpritchard@nealon.com)

/s/  
Grant E. Morris  
Virginia Bar No. 16260  
LAW OFFICES OF GRANT MORRIS  
1666 Connecticut Avenue, N.W.  
Suite 310  
Washington, D.C. 20009  
(202) 742-7783  
(202) 742-7776 (fax)  
[grantemorris@gmail.com](mailto:grantemorris@gmail.com)

/s/  
Charles B. Wayne  
Virginia Bar No. 24954  
Elisha A. King  
*Attorneys for General Electric Company*  
DLA PIPER LLP (US)  
500 8th Street, N.W.  
Washington, D.C. 20004  
(202) 799-4000  
(202) 799-5000 (fax)  
[charles.wayne@dlapiper.com](mailto:charles.wayne@dlapiper.com)

Of Counsel:

MORGAN, LEWIS & BOCKIUS LLP

Barbara Van Gelder  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 739-5256  
(202) 739-3001 (fax)

Sarah E. Bouchard  
Anne E. Martinez  
1701 Market Street  
Philadelphia, PA 19103  
(215) 963-5077/5718  
(215) 963-5001 (fax)

David W. Sanford  
Stefanie F. Roemer  
SANFORD, WITTELS & HEISLER, LLP  
1666 Connecticut Avenue, N.W.,  
Suite 310  
Washington, D.C. 20009  
(202) 742-7777  
(202) 742-7776 (fax)  
[dsanford@nydclaw.com](mailto:dsanford@nydclaw.com)  
[sroemer@nydclaw.com](mailto:sroemer@nydclaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of December, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

Grant E. Morris  
Law Offices of Grant Morris  
1666 Connecticut Avenue, N.W.  
Suite 310  
Washington, D.C. 20009

Robert B. Nealon  
Michael T. Pritchard  
Jay I. Igiel  
Nealon & Associates, PC  
119 N. Henry Street  
Alexandria, VA 22314

David W. Sanford  
Stefanie F. Roemer  
Sanford, Wittels & Heisler, LLP  
1666 Connecticut Avenue, N.W.  
Suite 310  
Washington, D.C. 20009

\_\_\_\_\_/s/\_\_\_\_\_  
Charles B. Wayne  
Virginia Bar No. 24954  
Elisha A. King  
*Attorneys for General Electric Company*  
DLA PIPER LLP (US)  
500 8th Street, N.W.  
Washington, D.C. 20004  
(202) 799-4000  
(202) 799-5000 (fax)  
[charles.wayne@dlapiper.com](mailto:charles.wayne@dlapiper.com)